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Sir:

Respectfully submitted,  
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In re Application of

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: Group Art Unit: 2171

: Examiner: Cam Linh T Nguyen

: Customer No.: 34610

# LEVEL OBJECT DATA USING MULTIMEDIA DATA

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This Appeal Brief is submitted in support of the Notice of Appeal filed October 21, 2003.

The party in interest is the assignee, LG Electronics Inc

There are no related appeals and interferences.

Serial No.: 09/594,808

Docket No.: CIT/K-114

### **STATUS OF THE CLAIMS**

This is an appeal from the final rejection dated July 21, 2003 of claims 1, 3-18, 20, 23-27, and 30-33. No other claims are pending.

### **STATUS OF AMENDMENTS**

A correct copy of appealed claims 1, 3-18, 20, 23-27, and 30-33, including all entered amendments thereto, appears in the attached Appendix. An after-final amendment under 37 C.F.R. 116 was filed on November 25, 2003 to correct a clerical error in claim 3. However, this Appeal Brief is drafted under the assumption that claim 3 is dependent on claim 1.

**SUMMARY OF THE INVENTION**

Embodiments of the present invention relate to browsing of multimedia data. (Specification, page 1, lines 1-2). In embodiments, the browsing of multimedia data includes browsing supplementary information on a particular object included in a moving picture. (Specification, page 3, lines 21-23). In some embodiments, supplementary information includes real information. (Specification, page 4, lines 18-20). Real information is information on a real place which is a meaningful place in view of the content of the moving picture. (Specification, page 6, lines 3-6).

**ISSUE**

Whether the Examiner erred in the rejection of claims 1, 3-18, 20, 23-27, and 30-33 under 35 U.S.C. § 102(e) because Jain et al. does not disclose "...real information [that] is information on a real place which is a meaningful place in view of the content of [a] moving picture."

**GROUPING OF THE CLAIMS**

Appealed claims 1, 3-18, 20, 23-27, and 30-33 form a single group and stand or fall together.

### THE ARGUMENT

The Examiner erred in the rejection of claims 1, 3-18, 20, 23-27, and 30-33 under 35 U.S.C. § 102(e) because Jain et al. does not disclose "...real information [that] is information on a real place which is a meaningful place in view of the content of [a] moving picture."

To establish a *prima facie* case of anticipation under 35 U.S.C. § 102, a single prior art reference must describe each and every element as set forth in the subject claim. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Also see M.P.E.P. § 2131.

Jain et al. relates to a multi-perspective viewer for content-based interactivity. The Final Office Action dated July 21, 2003 states on page 2 that "... 'statistical information' corresponds to the 'real information'..." However, statistical information is not information on a real place which is a meaningful place in view of the content of a moving picture, as recited in claims 1, 3-18, 20, 23-27, and 30-33.

The Final Office Action dated July 21, 2003 states on page 5 "[r]eferring to Fig. 9, col. 30 lines 49-50, col. 4 lines 21-24, clearly, the reference disclosed 'real information' about the player corresponds to 'name' of the player, or the 'location and environment in which the video event occurs' also is the 'real information'." In column 30, lines 49-51 and Figure 9 of Jain et al., object 502 and display area 508 are disclosed. However, object 502 and display area 508 do not

relate to real information that is information on a real place which is a meaningful place in view of the content of a moving picture, as recited in claims 1, 3-18, 20, 23-27, and 30-33. This is evident and apparent, as there is no disclosure in column 30, lines 49-51 of a “real place”.

The disclosure in column 4, lines 21-24 of Jain et al. relates to “...a user interface that allows a viewer/user to specify a specific perspective from which to view a scene.” (See column 4, lines 11-14). Column 4, lines 21-24 of Jain et al. does disclose “[a] video database structure is static and uses a priori knowledge of the location and environment in which [a] video event occurs.” However, there is no disclosure in column 4, lines 21-24 of real information that is information on a real place which is a meaningful place in view of the content of a moving picture, as recited in claims 1, 3-18, 20, 23-27, and 30-33. This is evident and apparent because “a priori knowledge of [a] location” is not the same as “information on a real place which is a meaningful place in view of the content of [a] moving picture”.

Accordingly, the single prior art reference of Jain et al. does not describe each and every element as set forth in claims 1, 3-18, 20, 23-27, and 30-33. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Further, the identical invention recited in claims 1, 3-18, 20, 23-27, and 30-33 is not shown in Jain et al. in as complete detail as is contained in these claims. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). At least for these reasons, a *prima facie* case of anticipation under 35 U.S.C. § 102 has not been established.

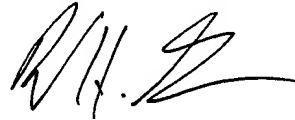
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**CONCLUSION**

The Appellants respectfully request the Honorable Board of Appeals and Interferences of the U.S. Patent and Trademark Office to withdraw the rejections of claims 1, 3-18, 20, 23-27, and 30-33 because *prima facie* case of anticipation has not been established.

Respectfully submitted,  
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**APPENDIX**

1. A method for browsing a moving picture comprising:

receiving moving picture information and multiple supplementary information including content information and real information on a program in the moving picture information on at least one object in the moving picture information;

separating the moving picture information and the multiple supplementary information;

displaying the moving picture information; and,

browsing/searching supplementary information related to a particular object from the multiple supplementary information, and displaying the supplementary information when a user requests for browsing/searching the supplementary information related to the particular object, wherein:

content information is information on a place or an object having meaning in view of content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

3. A method as claimed in claim 19, wherein the content information and the real information includes selective combinations of object information, event information, place information, and object/event/place in a graph.

4. A method as claimed in claim 3, wherein the content information and the real information includes;

text information describing character of the object, and  
image or graphic information on the character.

5. A method as claimed in claim 3, wherein the object information includes;  
text information having information describing the object, and  
an image illustrating the text information.

6. A method as claimed in claim 3, wherein the event information includes;  
text information describing contents of the event, and  
information on a place or a sketch map the event occurred.

7. A method as claimed in claim 3, wherein the place information includes;  
text information describing the place, and  
information on location or a sketch map of the place.

8. A multi-level object data structure in a system for displaying moving picture information, wherein:

the object data comprises multiple supplementary information on each object included in the moving picture information, wherein the multiple supplementary information further includes content information and real information on a particular program;

content information is information on a place or an object having meaning in view of content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

9. A multi-level object data structure as claimed in claim 8, wherein the content information and the real information includes selective combinations of semantic information which represents object information, event information, place information, and semantic information representing relations of object/event/place information in a graph.

10. A multi-level object data structure as claimed in claim 9, wherein the content information and the real information includes;

text information describing character of the object, and  
image or graphic information on the character.

11. A multi-level object data structure as claimed in claim 9, wherein the object information includes;

text information having information describing the object, and

an image illustrating the text information.

12. A multi-level object data structure as claimed in claim 9, wherein the event information includes;

text information describing contents of the event, and  
information on a place or a sketch map the event occurred.

13. A multi-level object data structure as claimed in claim 9, wherein the place information includes;

text information describing the place, and  
information on location or a sketch map of the place.

14. A multi-level object data structure describing a moving picture in an object description scheme for providing information on an object appearing in the moving picture, a place description scheme for providing information on a place required for describing a particular unit of event in the moving picture, and a relation graph description scheme of the object/event/place, and,

describing the moving picture in a dual structure including content information and real information of the moving picture on at least one relation for each of the relations or a selected element, wherein:

content information is information on a place or an object having meaning in view of

content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

15. A multi-level object data structure as claimed in claim 14, wherein each of the object description scheme, the place description scheme, and the event description scheme, including content information and real information of the moving picture, are expressed in text information describing at least object name, place name, and event.

16. A multi-level object data structure as claimed in claim 14, wherein the content information on the moving picture is information on a place or an object having a meaning in view of content of the moving picture, and the real information is information on a real place which is meaningful place in view of the content of the moving picture, or on actual performer cast an object in the moving picture.

17. A system for browsing a moving picture comprising:  
means for supplying moving picture information including multiple object information having content based meaningful object information of the moving picture and real information of the object;  
means for receiving the moving picture information;

means for presenting real object information included in the multiple object information in response to a users request, wherein:

content based meaningful object information is information on a place or an object having meaning in view of content of the moving picture; and  
real information is information on a real place which is a meaningful place in view of the content of the moving picture.

18. A system as claimed in claim 17,

wherein the multiple object information are provided for each of the object, the place, and the event,

wherein the means for presenting real object information provides real information on an object cast in the moving picture or real place information on the place which is a background of an event.

20. A method comprising receiving supplemental information specific to each object of a plurality of objects included in moving picture data, wherein:

said each object of the plurality of objects is at least one of a person, a place, and a thing; and

the supplemental information includes real information and content information, wherein:

content information is information on a place or an object having

meaning in view of content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

23. The method of claim 20, wherein the person is at least on of:

a person whose image is captured, depicted, or illustrated on the moving picture data;

a person whose voice is being captured, depicted, or illustrated on the moving picture data; and

a person who is associated with the production of the moving picture data.

24. The method of claim 20, wherein the place is the location

captured, depicted, or illustrated on the moving picture data.

25. The method of claim 20, wherein the thing is at least one of:

sound captured on the moving picture data;

an object captured, depicted, or illustrated on the moving picture data; and

an attribute of the moving picture data.

26. The method of claim 25, wherein the sound captured is at least one of a musical

song, a natural sound, or verbal language.

27. An apparatus configured to receive supplemental information specific to each object of a plurality of objects included in moving picture data, wherein:

the each object of the plurality of objects is at least one of a person, a place, and a thing; and

the supplemental information includes real information and content information, wherein:

content information is information on a place or an object having meaning in view of content of the moving picture; and

real information is information on a real place which is a meaningful place in view of the content of the moving picture.

30. The apparatus of claim 27, wherein the person is at least one of:

a person whose image is captured, depicted, or illustrated on the moving picture data;

a person whose voice is being captured, depicted, or illustrated on the moving picture data; and

a person who is associated with the production of the moving picture data.

31. The apparatus of claim 27, wherein the place is the location captured, depicted, or illustrated on the moving picture data.



32. The apparatus of claim 27, wherein the thing is at least one of:

sound captured on the moving picture data;

an object captured, depicted, or illustrated on the moving picture data; and

an attribute of the moving picture data.

33. The apparatus of claim 32, wherein the sound captured is at least one of a musical song, a natural sound, or verbal language.